

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

United States of America,

Plaintiff,

v.

Christopher L. Gattarello, et al.,

Defendants.

CASE NO. 1:14-cr-00353-DCN-3

JUDGE DONALD C. NUGENT

**DEFENDANT, WILLIAM JACKSON'S, MOTION TO BE RELEASED INTO THE
CUSTODY OF COMMUNITY ASSESSMENT AND TREATMENT SERVICES**

Now comes the Defendant, William Jackson, by and through undersigned counsel, and hereby respectfully requests this Honorable Court to release the Defendant, William Jackson, into the custody of Community Assessment and Treatment Services ("CATS") located at 8411 Broadway Avenue, Cleveland, Ohio 44105 (<http://communityassessment.org/>).

During a Violation Hearing on February 23rd, 2017, Defendant William Jackson's bond was revoked and he was remanded into the custody of the US Marshal's Office due to his seventh violation for testing positive for marijuana. Defendant William Jackson has expressed his desire in undergoing an alcohol and drug assessment followed by treatment for his drug addiction.

Toward this end, Counsel for the undersigned has been in contact with the CATS for the Federal Probation Program Supervisor, Patricia Pierce, at (216) 938-6829 ext. 115 who indicated a bed is available for William Jackson. Also, Counsel for William Jackson, has been in contact with Probation Officer, Pat LeVechia, who indicated that he has also been in contact with Patricia

Pierce regarding placement of William Jackson into CATS through the US Pretrial Probation Services Department. As Defendant William Jackson suffers from drug addiction and wants help for his disease placement of William Jackson into CATS is appropriate. Placement of Defendant of William Jackson into CATS also enables him to prepare and work with his counsel for his upcoming trial scheduled for April 17, 2017.

Accordingly, Defendant William Jackson respectfully requests this Honorable Court for his release into the custody of CATS for drug treatment.

Respectfully submitted:

/s/ Michael Blumenthal

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Attorneys for Defendant, William S. Jackson, Jr.

CERTIFICATE OF SERVICE

On February 25, 2017, a copy of the foregoing *Defendant, William Jackson's, Motion to be Released into the Custody of Community Assessment and Treatment Services* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Michael R. Blumenthal

Michael R. Blumenthal

**One of the Attorneys for Defendant, William S.
Jackson, Jr.**